

From: cricket@savingourseed.org
Sent: Wednesday, May 21, 2008 1:50 PM
To: Frances, Valerie
Subject: My comments that I intended to deliver yesterday
Valarie,

We met yesterday. Unfortunately, I was unable to make my comments directly to the board due to time constraints, but I have included everything that I intended to say below:

Comments for the National Organic Standards Board

May 20, 2008, Baltimore, MD

Brian (Cricket) Rakita of the Organic Seed Sourcing Service, a project of the Carolina Farm Stewardship Association.

Good Folks,

For the record, I also am an independent organic inspector, manager of the Goochland, VA farmers market, and am a grower of organic vegetables and conventional GMO free eggs.

First of all, let me answer the question posed by the board today about which came first, the chicken or the egg. Being one that believes in evolution, I know that the egg came first, and it was laid by something that looked a lot like a chicken, but it was a little bit genetically different. I advise you take this philosophy to heart when considering how to deal with the need for a standard for organic carnivorous fish (the issue which inspired the question). Start with the building blocks, and go from there.

I am here to educate you about the strengths and successes of the organic seed industry. The Organic Seed Sourcing Service, which can be found at www.organicseedsourcing.com, has been dedicated to helping growers find the organic seeds they are looking for. Like the OMRI seed list, we maintain an online database of organic seeds, but we go a step further, tracking all available NOP certified organic seeds that we can find, not just those from businesses that can and will pay to have them listed. Thus far this year, 89% of all searches conducted at our database yielded results.

As a student of the organic seed business, let me tell you all that the organic seed industry is ready to meet the needs of almost every organic grower, be (s)he large or small. In the vast majority of cases, if a grower finds that the availability of a specific cultivar is too low for their needs, they can call the dealer ahead of time and the dealer will contract the seeds with them for the following year. Many of the largest organic growers are not taking this initiative, using the current lack of availability of the quantity of seeds that they need as a short term excuse.

Vegetable, herb, and grain Seed dealers are ready for stricter enforcement of 205.204, the regulation requiring growers to use organic seed. If specific growers are unable to find organic seeds in the quantities they need, they should be held accountable to a documented exploration of contracting for seed needs in future years in order to be in compliance with 205.204.

As of yet, many types of certified organic flower seeds and a few types of certified organic grass seed are not currently available organically.

Many growers are also using the fact that a conventional variety that they are used to is not available organically as an excuse to not plant organic seed. This is especially true with hybrid seed, as the parent lines are often tightly controlled by businesses that are not interested in organics. The fact of the matter is that dedicated organic seed producers have been fervently breeding seeds (both open pollinated and hybrid) **to do well in organic conditions**, unlike the conventional standbys. When growers are inspired to plant these OG seeds as a trial, they are often impressed, and like the organically bred cultivars better than their standby conventional ones.

In summary, the organic seed industry in the United States is ready for 205.204. I would encourage you all to encourage the certification bodies to educate growers about the readiness of these dedicated seed dealers to meet the needs of the organic growers and consumers that rely on NOP certified organic agriculture.

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